



CBS

1515 BROADWAY
NEW YORK, NEW YORK 10036-5794

(212) 846-3595
FAX: (212) 846-1907
hfjaeckel@cbs.com

HOWARD F. JAECKEL

VICE PRESIDENT AND ASSOCIATE GENERAL COUNSEL

ELECTRONICALLY FILED

Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

February 21, 2006

This is in response to the Commission's request for comments on the proposal of the Society of Broadcast Engineers ("SBE") to amend the Universal Licensing System (ULS), and FCC Form 601, to allow TV Pickup licensees to document the location and height of their electronic news gathering (ENG) receiving sites.¹ *See, Public Notice*, RM-11308 (January 23, 2006). CBS Corporation ("CBS"), which conducts extensive electronic news-gathering operations both through its CBS News Division and its owned and operated television stations, strongly supports this proposal.

In order to provide the immediate coverage of breaking news developments that the public has come to expect, the availability of line-of-sight transmission paths between ENG trucks and receive-only facilities is essential. That is why ENG receive-only (ENG-RO) sites are placed on tall buildings, mountain tops, and near the tops of tall towers.

But regardless of the number and placement of a newsgatherer's ENG-RO sites, its capacity to cover an event in a timely manner can be nullified if the sensitive receiver of the ENG facility is overwhelmed by the high power transmissions to and from a nearby adjacent band Personal Communications Service (PCS) or Third-Generation (3G) base station. When this occurs, a phenomenon known as "brute force overload" can result.

¹ The SBE petition also requests that the Universal Licensing System be amended to afford to Remote Pickup (RPU) licenses a similar capacity to document the location and height of any RPU receive-only sites they may have.

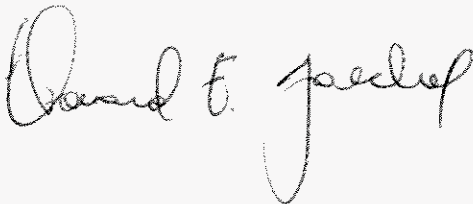
"Brute Force Overload" can render an ENG-RO site useless, at least until special filters can be obtained and installed. Of course, even in instances where the installation of such filters is ultimately successful in obviating the problem, the fix will nonetheless have occurred long after the ability to cover the original news event has been lost. Still worse, where filtering does not prove to be a sufficient remedy, nothing other than relocation of the PCS/3G or the ENG-RO site will solve the problem. Needless to say, this is a very expensive solution.

The problem of "Brute Force Overload" is one that CBS believes should, in the first instance, be addressed by good-faith consultation and cooperation between PCS/3G licensees and broadcasters. Presently, however, even the best-intentioned PCS/3G operator cannot avoid inadvertently selecting a site location too close to an ENG-RO facility; it simply has no way of readily ascertaining the locations of such sites.

CBS respectfully submits that this situation should not be permitted to continue when there is a simple, readily-available solution at hand. That solution is to amend the Universal Licensing System, and Form 601, as suggested by SBE, to give TV Pickup licenses the option of entering the locations and heights of their ENG-RO sites into the ULS, so that they may be made available to interested parties in a searchable data base.

For these reasons, CBS supports the SBE petition. We respectfully urge the Commission to promptly issue a Notice of Proposed Rulemaking looking toward such an amendment.

Sincerely,

A handwritten signature in cursive script, appearing to read "David E. Jacobs". The signature is written in dark ink on a white background.